



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2009 DEC -7 P 2:14

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Thomasenia P. Duncan
General Counsel

Ann Marie Terzaken
Associate General Counsel for Enforcement

Stephen A. Gura
Deputy Associate General Counsel for Enforcement

BY: Sid Rocke *SR*
Assistant General Counsel

Kimberly D. Hart
Attorney *KH*
Grdr

SUBJECT: MUR 6232 (Formerly Pre-MUR 484) (Gladwin Gill – Factual and Legal Analysis)

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CELA

On December 14, 2007, Gladwin Gill entered a guilty plea to one count of knowingly and willfully violating the Federal Election Campaign Act of 1971, as amended, ("the Act") by making contributions in the names of others to various political committees. 2 U.S.C. § 441f.

Despite clear evidence that Gill knowingly and willfully violated the Act, on November 17, 2009, the Commission determined that it would open a matter under review, but also that it would not be a prudent use of resources to pursue Gill, the potential corporate entities, or the conduits in this matter and dismissed MUR 6232 as a matter of prosecutorial discretion and therefore closed the file. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

Attached is a Factual and Legal Analysis that summarizes the Commission's actions. It is being circulated on a 48-hour no-objection basis. The file in this matter,

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including the Factual and Legal Analysis, will be placed on the public record within 30 days of closing the file.

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